

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**AFFIDAVIT IN SUPPORT OF MOTION
TO CONTINUE TRIAL DATE**

LOUIE SHIPPENTOWER,
Defendant.

STATE OF OREGON)
County of Multnomah) ss.

I, Susan Russell, being duly sworn, hereby depose and say:

1. I represent Louie Shippentower, who is charged with Felon in Possession of

a Firearm. Trial is set for June 26, 2012. Mr. Shippentower is in custody.

2. A continuance is necessary in order to afford defense counsel adequate time to complete pretrial investigation, obtain necessary records, consult with the defendant and explore possible defenses and pretrial motions, as well as meet with the government and present mitigating information in an attempt to resolve the case short of trial. This is the first continuance request.

3. The failure to grant a continuance in this case would deny counsel for the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(A).

4. Defense counsel has discussed this requested continuance with counsel for the government, John Haub, and he has no objection to the requested continuance.

5. Defense counsel has spoken with Louie Shippentower, explained the reasons for requesting a continuance, and the rights that Mr. Shippentower has under the Speedy Trial Act. Mr. Shippentower agrees with defense counsel's request for a continuance and waives his rights under the Speedy Trial Act.

6. This affidavit is made in good faith and in support of Mr. Shippentower's

motion for continuance of the trial date in this case.

DATED this 21st day of June, 2012.

/s/ Susan Russell

Susan Russell

Attorney for Defendant

SUBSCRIBED AND SWORN TO before me this 21st day of June, 2012.

/s/ Christine Moore

Notary Public for Oregon